

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff	)	The Honorable Liam O'Grady
v.	)	
	)	
KIM DOTCOM, et al.,	)	Criminal Action No. 1:12-CR-3
	)	
Defendants	)	

**[PROPOSED] ORDER**

UPON CONSIDERATION of the motion filed by specially appearing defendant Megaupload Limited and for the reasons stated in support thereof, it is hereby:

ORDERED that attorneys from Quinn Emanuel Urquhart & Sullivan LLP and the Rothken Law Firm are granted leave to enter limited and special appearances on behalf of Defendant Megaupload Limited for the purpose of filing the Brief of Interested Party Megaupload Limited Regarding Rule 41(g) Hearing.

It is further ORDERED that Defendant Megaupload Limited will not be deemed to have waived any of its jurisdictional objections by virtue of the filing or arguing of the brief.

It is further ORDERED that the brief that the above-referenced counsel have proposed for filing pursuant to their limited and special appearances shall be deemed to have been properly filed *nunc pro tunc* on October 30, 2012.

It is further ORDERED that, after the Court's resolution of the brief, counsel entering limited and special appearances pursuant to this Order may at their option withdraw their appearances without seeking further approval from this Court.

Dated: \_\_\_\_\_, 2012

---

Judge Liam O'Grady  
United States District Judge